



FEDERAL COMMUNICATIONS COMMISSION
Enforcement Bureau, Investigations and Hearings Division
445 12th Street, S.W., Room 3-B443
Washington, D.C. 20554

July 2, 2002

Caryn D. Moir
Vice President - Federal Regulatory
SBC Telecommunications, Inc.
1401 I Street, NW
Suite 400
Washington, DC 20005-2296
fax 202-408-4809

RE: Section 271 Compliance Review Program for Arkansas and Missouri

Dear Ms. Moir:

As you know, on November 16, 2001, the Commission granted SBC's application to provide in-region interLATA toll service in Arkansas and Missouri pursuant to section 271 of the Communications Act of 1934, as amended ("the Act"). *See Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Arkansas and Missouri*, 16 FCC Rcd 20719 (2001) ("Order"). The Enforcement Bureau ("the Bureau"), therefore, will now monitor SBC's continuing compliance with section 271 through the Section 271 Compliance Review Program. This program is based on a structured and systematic approach to compliance review and enforcement. The Bureau has assigned a team of auditors, attorneys, and other professional staff from the Investigations and Hearings Division ("Compliance Review Team" or "Team") to work with SBC through the duration of the review and to monitor SBC's performance in Arkansas and Missouri. The primary team members responsible for this review are David Janas, Attorney; Austin O'Connor, Auditor; and Andrew Skadin, Auditor.

During the review, the Team will closely review SBC's performance in subject matter areas that the Commission has identified as areas of concern in the section 271 Order. In this regard, we have enclosed with this letter an attachment listing the specific performance measures and other areas about which the Commission expressed its concern in the Order. Although the Bureau will focus its review on these areas, it may also monitor other areas not noted by the Commission in the Order. Generally, the Bureau's review will occur in two phases.

Phase 1: Within the next few days, a representative from the Bureau will contact SBC to schedule a planning meeting with SBC representatives and the Team overseeing the review. The purpose of this meeting is to provide SBC with the opportunity to participate in developing the Review Program and to assist the Bureau in selecting the type and format of information pertaining to SBC's performance that the Team will review. SBC should be prepared to discuss the areas of concern that the Commission noted in the 271 Order (also listed in the attachment to this letter) and to identify knowledgeable employees, applicable corporate records, and computer systems related to these areas. Following this meeting, the Team will send a follow-up letter to SBC memorializing the discussions at the meeting and describing the

information SBC is responsible for submitting to the Bureau approximately twelve months after the approval date (*i.e.*, November 16, 2002). The Team will also continue to monitor SBC's performance during Phase 1 through the monthly carrier to carrier performance reports the Commission's Order required SBC to submit.

Phase 2: The second phase of the review will begin after SBC submits the information the Team required in Phase 2 and will consist of less formal contacts and inquiries by the Bureau.

At any time during this review, the Team may ask SBC to provide additional information or to attend additional meetings with SBC employees who have expertise in specific subject matters. These additional inquiries may supplement existing requests or may encompass new inquiries.

Finally, SBC should provide to the team at the initial meeting during Phase 1 the names and contact information of employees who are authorized to respond to requests for information on behalf of the corporation. If you have any general questions concerning the issues raised in this letter, please feel free to contact me at (202) 418-1420. You may also contact Anthony Dale, Assistant Chief, Investigations and Hearings Division at (202) 418-2260 or Trent Harkrader, Section 271 Compliance Review Program Team Leader at (202) 418-2955. Thank you in advance for your cooperation.

Sincerely,

Maureen F. Del Duca
Deputy Chief, Investigations and Hearings Division
Enforcement Bureau

Attachment
Section 271 Compliance Review Program
SBC: Arkansas and Missouri
Commission Identified Compliance Review Subjects¹

- I. Checklist Item 1: Interconnection
 - A. Collocation (*See Order*, paragraph 86)
 - B. Installation (*See Order*, paragraph 87)
 - C. Point of Interconnection (*See Order*, paragraph 88)
 - D. Pricing (*See Order*, paragraphs 92-96)
- II. Checklist Item 2: Unbundled Network Elements
 - A. Access to OSS
 - 1. Data Reliability (*See Order*, paragraphs 16-20)
 - 2. Maintenance and Repair/LMOS (*See Order*, paragraphs 22-36)
 - 3. Pre-Ordering (*See Order*, paragraph 37)
 - 4. Ordering
 - a) Order Confirmation Notices (*See Order*, paragraph 39)
 - b) Order Rejection Notices (*See Order*, paragraph 40)
 - c) Order Flow-Through Rate (*See Order*, paragraphs 41-43)
 - 5. Provisioning (*See Order*, paragraph 44)
 - 6. Billing (*See Order*, paragraphs 45-46)
 - 7. OSS of Advanced Services Affiliate (*See Order*, paragraph 47)
 - B. Pricing of UNEs
 - 1. Recurring Charges (*See Order*, paragraphs 52-68)
 - 2. Nonrecurring Charges (*See Order*, paragraphs 71-75)
 - C. Provision of UNE Combinations (*See Order*, paragraphs 76-77)
- III. Checklist Item 4: Unbundled Local Loops
 - A. xDSL-Capable Loops (*See Order*, paragraphs 100-01)
 - B. Hot Cuts (*See Order*, paragraph 102)
 - C. Voice Grade Loops (*See Order*, paragraph 103)
 - D. Line Sharing (*See Order*, paragraphs 104-05)
 - E. Line Splitting (*See Order*, paragraph 106)
 - F. High Capacity Loops (*See Order*, paragraphs 107-09)
 - G. Disconnecting IDSL (*See Order*, paragraph 110)
- IV. Checklist Item 6: Switching (*See Order*, paragraphs 111-13)
- V. Checklist Item 13: Reciprocal Compensation (*See Order*, paragraphs 114-15)
- VI. Checklist Item 14: Resale (*See Order*, paragraphs 78-84)

¹ Consistent with the representation in the letter pertaining to the scope of the Bureau's review, the Bureau may monitor for enforcement purposes other subjects or performance indicators not expressly noted by the Commission in the Order or in this Attachment.